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August 26, 2020

BY ELECTRONIC CASE FILING

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Hernan Lopez and Carlos Martinez*, Case No. 15-cr-252  
(Def. Nos. 32 and 33) (PKC)

Dear Judge Chen:

We represent Defendants Hernan Lopez and Carlos Martinez in the above-captioned case, pending before Your Honor. Through this letter, Mr. Lopez and Mr. Martinez move for an order allowing them to file a Reply in Support of their Motion for Severance of Defendants, which shall not exceed seventeen (17) pages in length. Under the Court's Individual Practices and Rules, reply memoranda are limited to ten pages, not including exhibits, appendices, or attachments, "[u]nless prior permission has been granted." See Judge Pamela K. Chen Individual Practices and Rules, at ¶ 3(B). Mr. Lopez and Mr. Martinez request an additional seven pages to fully respond to the points raised by the government in its Opposition to their Motion for Severance of Defendants.

On August 26, 2020, Mr. Lopez and Mr. Martinez sought the United States' position on the relief requested herein. Assistant United States Attorney Sam Nitze represented that the United States consents to the relief requested herein.

Also on August 26, 2020, Mr. Lopez and Mr. Martinez sought Defendant Full Play's position on the relief requested herein. Carlos Ortiz, attorney for Defendant Full Play, represented that Full Play consents to the relief requested herein.

Wherefore, for the reasons cited herein, it is respectfully requested that the Court grant this application and issue an Order allowing Mr. Lopez and Mr. Martinez to file a Reply in Support of their Motion for Severance of Defendants, which shall not exceed seventeen (17) pages in length.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Julia M. Coleman".

Julia M. Coleman  
Steven J. McCool  
Michael Cornacchia  
Ramon Abadin  
*Counsel for Carlos Martinez*

Matthew D. Umhofer  
James W. Spertus  
Samuel A. Josephs  
*Counsel for Henan Lopez*

cc: Counsel of record (by ECF)